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From:

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Subject:

FW: Chlordane at MCB Hawaii, Kaneohe Bay

Categories:

DOH PIS Inquiry, ENV- Misc, Pesticide Impacted Soil- MCBH

I'm forwarding Anne's e-mail regarding PPV's storm water management plan for the 212-housing site. I am preparing the response to Senator Akaka's letter forwarding Walter Chun's issues with the chlordane-contaminated soil. I need two issues clarified. The first issue involves notifications provided to residents (new and existing) on the chlordane issues, and prohibitions and precautions to minimize or preclude contact with the chlordane-contaminated soil. The second issue is further clarity on the control of sediment discharge to the storm drain system. Anne could only pull the limited information regarding street cleaning and maintenance of ground cover. Is there a provision for the placement of filter fabric at catch basins/inlets? I would appreciate a response asap as I need to have a draft for review early next week.

-----Original Message-----

From: (b) (6)

Subject: Chlordane at MCB Hawaii, Kaneohe Bay

Hi, Wayne!

I talked to Elaine today, and she said that she stopped working on the chlordane issue after it was decided last week that NAVFAC HI would be the point of contact for the Congressional request regarding chlordane.

I've put together the following as best information I could get.

Response for Congressional request regarding chlordane-contaminated soil at housing at MCB Kaneohe. Paragraph "IT IS UNLAWFUL TO DISCHARGE POLLUTANTS TO PROTECTED WATERS."

As stated in the letter, the Clean Water Act prohibits the discharge of pollutants to the environment. Because sediment is considered to be a pollutant, regardless of whether it contains chemical contaminants, best management practices are in place to prevent the discharge of any sediment into waters of the United States.

Even though chlordane was not identified as a potential contaminant of concern when the BMP plan was developed for the 212 housing project, the contractor was required to implement erosion and sediment control measures to prevent the discharge of sediments to comply with NPDES general permit coverage for discharges of storm water associated with construction activities. Also in compliance with general permit coverage, areas surrounding the houses were covered with pavement or vegetation to prevent future runoff of soil from the site when construction was completed.

Following completion of the housing construction, BMPs implemented during operation and maintenance of the facilities include street sweeping of major streets to keep soil from entering the storm drainage system and provision of cover (e.g., vegetation, mulch) for exposed surfaces with high erosion potential. For future construction projects at housing areas, any soil that contains chlordane at unsuitable levels will be covered by a layer of soil that is free of chlordane and other contaminants.

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I'll follow up with ROICC on BMPs during construction.

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